

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)	Chapter 11
)	
Squirrels Research Labs LLC, <i>et al.</i> ¹)	Case No. 21- 61491
)	
Debtors.)	(<i>Jointly Administered</i>)
)	
)	Judge Tiiara N.A. Patton
)	

**MOTION OF SQUIRRELS RESEARCH LABS LLC AND THE MIDWEST DATA
COMPANY LLC TO LIMIT SERVICE OF THEIR SUPPLEMENTAL BRIEF IN
SUPPORT OF THE ALLOCATION OF INSURANCE PROCEEDS**

Squirrels Research Labs LLC (“SQRL”) and The Midwest Data Company LLC (“MWDC”, collectively with SQRL, the “Debtors”), by and through undersigned counsel, hereby move the Court to limit service of their Supplemental Brief (the “Supplement”) in Support of the Allocation of Insurance Proceeds filed contemporaneously herewith. In support of this Motion, the Debtors respectfully state the following:

1. The Motion for Entry of an Order Approving Compromise and Settlement with Cincinnati Insurance Company (the “Motion to Compromise”) was filed on April 9, 2024 and served on all creditors and parties in interest, as set forth on the certificate of service, along with a Notice of the deadline to object and the date of a hearing on the Motion to Compromise [Docket ## 323, 326].

¹ The “Debtors” in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

2. The objection deadline passed on May 2, 2024. The only timely filed objection is that of Second Foundation Mining LLC by and through the CEO, Robert Oxsen, of Second Foundation Mining LLC.

3. On or about May 8, 2024, Paul Billinger filed an objection after the deadline for doing so had passed.

4. No other objections were filed with the Court before the Court held a hearing on the Motion to Compromise.

5. Appearing at the hearing on the Motion to Compromise were Paul Billinger, Counsel for the Debtors, counsel for Cincinnati Insurance Company, a trial attorney with the Office of the United States Trustee, and the Subchapter V Trustee.

6. At the hearing on the Motion to Compromise, the Court approved the compromise and directed submission of supplemental briefing and support for the proposed allocation of the settlement payment. [Docket #341].

7. On June 10, 2024, Billinger filed an “Objection of Paul Billinger to the Settlement Agreement and Mutual Release Filed By Debtor Squirrels Research Labs, LLC (Doc. 323)” [Docket #346].

8. The list of all creditors and parties in interest is extensive, and includes entities and individuals in foreign jurisdictions. Mailing a copy of the Supplement to all of those creditors and parties in interest would be expensive and burdensome to the estate. The Debtors submit that cause exists to limit notice of the Supplement to (1) Paul Billinger, by email to paul.billinger@toreaconsulting.com, and (2) electronically to all parties listed on the Court’s Electronic Mail Notice List, including the United States Trustee. The Debtors believe limiting

service of the Supplement to these parties is appropriate and adequate service and provides fair and reasonable notice.

WHEREFORE, the Debtors respectfully request the Court enter an Order substantially in the form attached hereto as Exhibit A, granting the relief requested in this Motion and granting such other and further relief as is appropriate under the circumstances.

Dated: June 21, 2024

Respectfully submitted,

/s/ Julie K. Zurn

Marc Merklin (0018195)

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CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2024, a true and correct copy of the Motion of Squirrels Research Labs LLC and the Midwest Data Company LLC to Limit Service of Their Supplemental Brief in Support of Allocation of Insurance Proceeds, was served via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

John C. Cannizzaro on behalf of Interested Party Instantiation LLC at John.Cannizzaro@icemiller.com, Kelli.Bates@icemiller.com

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Julie K. Zurn on behalf of Plaintiff Squirrels Research Labs LLC at
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Kate M. Bradley ust44 on behalf of U.S. Trustee United States Trustee at
kate.m.bradley@usdoj.gov

And by email to: paul.billinger@toreaconsulting.com

/s/ Julie K. Zurn

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